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**VIA ECF**

April 4, 2022

The Honorable James R. Cho  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Barker v. Rokosz, et al.*, 19 Civ. 00514 (KAM) (JRC)

Dear Judge Cho:

My office, along with Richman Law & Policy, represents Plaintiff Carla Barker in the above-referenced action. I write to respectfully supplement Defendant Legum's status report filed at Docket Entry 248. Shortly after Defendant Legum's filing, Plaintiff's counsel clarified the below. Defendant Legum's status report is acceptable other than two points.

First, Plaintiff already served her deficiency letter upon Defendant Legum on December 23, 2021. Per the Court's order and per Defendant Legum's proposed one-week response deadline, Defendant Legum should respond by April 11, 2022. Per the Court's order, Plaintiff proposes filing a joint letter within two weeks thereafter, on April 25, 2022.

Second, item no. 5 requires submission of a joint status letter. (ECF Minute Order of 12/20/2021 ["Legum and counsel for Rokosz to discuss Legum's privilege log and whether Legum has permission to identify the transaction identified in the privilege log. Legum to report back to plaintiff. If parties are unable to resolve the privilege issue, parties shall submit a joint letter by [adjourned date]."].) To that end, Plaintiff proposes that Defendant Legum confer with Defendant Rokosz and report back to Plaintiff within one week, by April 11, 2022, Plaintiff will respond to Defendant Legum within one week thereafter, by April 18, 2022, and the parties will submit a joint letter to the Court thereafter by April 25, 2022.

Respectfully Submitted,

/s/ *Belinda Luu*

Belinda Luu

cc: All Counsel of Record (by ECF)